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17 LINKEDIN CORPORATION

18 UNITED STATES DISTRICT COURT  
19  
20 NORTHERN DISTRICT OF CALIFORNIA  
21  
22 SAN JOSE DIVISION

23 COURTNEY COLE individually and on  
24 behalf of all other persons similarly situated,

25 Respondent,

26 v.

27 LINKEDIN CORPORATION,

28 Defendant.

Case No. 5:25-cv-01097-PCP

**STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE CASE  
MANAGEMENT CONFERENCE,  
AS MODIFIED**

Dept.: Courtroom 8, 4th Floor  
Judge: Hon. P. Casey Pitts

Date Filed: February 3, 2025

Trial Date: Not Yet Set

1 Pursuant to Civil Local Rule 6-2, Plaintiff Courtney Cole (“Plaintiff”) and Defendant  
2 LinkedIn Corporation (“LinkedIn”) (collectively “the Parties”) hereby agree and jointly stipulate  
3 as follows:

4 **WHEREAS**, Plaintiff filed the above-captioned case on February 3, 2025;

5 **WHEREAS**, LinkedIn filed a motion to dismiss that, if granted, would be dispositive of  
6 the entire case;

7 **WHEREAS**, the Court heard argument on LinkedIn’s motion to dismiss on September 4,  
8 2025;

9 **WHEREAS**, the case management conference is currently scheduled for October 16,  
10 2025, with related deadlines as follows: Rule 26(f) conference due by September 25, 2025; joint  
11 case management statement due by October 2, 2025; and initial disclosures due by October 9,  
12 2025;

13 **WHEREAS**, the Court’s Standing Order for Civil Cases permits parties to “stipulate to  
14 hold the initial CMC 60 days or more after the hearing” when “a pending motion to dismiss is  
15 dispositive of an entire case”;

16 **WHEREAS**, counsel for both Parties have met and conferred and agree that postponing  
17 the case management conference and related deadlines would promote efficiency and conserve  
18 judicial and party resources pending resolution of LinkedIn’s dispositive motion;

19 **NOW, THEREFORE**, the Parties agree and jointly stipulate, as follows:

20 1. The initial case management conference currently scheduled for October 16, 2025,  
21 shall be continued to November <sup>20</sup>~~13~~, 2025, at 1:00 p.m.

22 2. The Parties shall hold the Rule 26(f) conference by October 23, 2025.

23 3. The Parties shall submit their joint case management statement by <sup>November 13</sup>~~October 30~~,  
24 2025.

25 4. The Parties shall serve initial disclosures by November 6, 2025.

1 Dated: September 12, 2025

KEKER, VAN NEST & PETERS LLP

2  
3 By: /s/ Niall M. Frizzell  
NIALL M. FRIZZELL

4  
5 Dated: September 12, 2025

Attorneys for Defendant  
LINKEDIN CORPORATION  
DRURY LEGAL, LLC

6  
7 By: /s/ Joshua D. Arisohn  
JOSHUA D. ARISOHN

8 Attorneys for Plaintiff COURTNEY COLE  
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10  
11 **ATTESTATION**

12 Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
13 document has been obtained from the other signatories.  
14


15 Dated: September 12, 2025

16 By: /s/ Niall M. Frizzell  
17 NIALL M. FRIZZELL

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 15, 2025

By:   
Hon. P. Casey Pitts  
United States District Judge